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U.S. Department of Transportation Dockets
Docket Number FAA-1999-5401
400 Seventh Street SW.
Room-Plaza 401
Washington D.C. 20590

NPRM Docket Number FAA-1999-5401; Aging Airplane Safety, Comments

Dear Sir,

We would like to share our comments with you about proposed Rule Docket Number FAA-1999-5401. This Docket addresses the aging aircraft fleet and our concerns of continuing maintenance and safety as aircraft age. We have traveled a great amount of time using the United Sates aircraft fleet for several years. We have perceived a connection between the age of the aircraft we are scheduled to fly on and the maintenance problems encountered at flight time. From our prospective aircraft appear to require more line maintenance for operational readiness and endure a greater amount of repairs as the age of the airframe increases. These variables also appear to increase exponentially as the age increase. This scenario indicates that at some time in the life of the aircraft, if it survives long enough, it may require more time to be spent in a hangar for repair and maintenance than there would be time available for flight. However before the curve of this graph would break over an accident could become very likely due to the age of the aircraft. For example if a person plays a red seven in Los Vegas for a long enough time, it may produce a win. However in an aircraft

accident prevention situation this gamble would have been considered to have produced a catastrophe.

The Federal Aviation Administration currently has issued Airworthiness Directives for each type of aircraft in the fleet. The aircraft operator is totally dependent on the aircraft manufacturer to produce this AD data for their use on their fleet as a whole. There is a flaw in this current system. If an operator has set up his maintenance and repair program incorrectly, even if just on one item, the entire fleet would have that particular item missing or incorrect on all aircraft. As an aircraft ages these errors could become compounded and not discovered until an incident or accident occurs. This produces an especially dangerous situation in the case of major alterations or structural repairs to the airframe. Inspections of each individual aging aircraft are require to include a review of all Federal Aviation Administration Airworthiness Directives, corrosion inspection and prevention program initiatives and major structural alterations and repairs which have occurred over the lifetime of the airframe. Many of these inspections are tenuous, difficult to gain access to for visual confirmation and expensive to perform. As the aircraft age increases these inspections become more numerous and more important The current FAA program is similar to any other audit type system. A sampling is taken from the fleet as a whole and under goes a review. Only if problems are discovered in that cursory review does the review process continue.

An aircraft that is fifteen years old has been through thousands of cycles. Even though it has been through many inspections, these are mostly routine in nature and are not necessarily age specific in nature. A fourteen year cardinal age for an aircraft aging type of inspection is surely needed. One can only imagine what all an individual aircraft has been through in that length of time of flying. Add to this the technological advances that have been made in a fourteen year span and certainly this presents many questions that could be answered with an age specific inspection. I would suggest a five year interval of inspections should begin to occur after the fourteen year inspection is completed depending upon the expected design life of the type of aircraft. In this manner the inspection records obtained from the fourteen year inspection could be utilized in the five year interval inspection process and a more meaningful inspections could take place. These inspections should be aircraft specific, regulatory and not a general sampling of an operators fleet.

New technologies, metal fatigue and airline consumer confidence are just some of the reasons for support of Document FAA-1999-5401, Aging Airplane Safety. This regulatory action could also help produce an overall younger aircraft fleet in our country. This may also allow for the latest safety equipment and technological advancements to be designed into new airplanes and not added on older airframes as an after market accessory. At some point in the life cycle of aircraft it becomes more expensive to own and operate the older airplanes than it is to purchase and operate the newest and latest aircraft available. Safety of flight, consumer confidence and expedient travel are all most important aspects

in the aviation industry. Economics must also be factored in for any industry to succeed. If the airline industry endures financial problems only attributable to aircraft safety inspections it could alert to us that something is wrong in the overall equation. That has not been the case in the past. However without a pleasant flying experience with no equipment problems and an excellent safety record consumer confidence depletes and more financial woes are sure to come to the airline industry.

This could be considered by some people attributable to the lasting result of deregulation. The alternative of bringing back some form of airline regulation has its merits. Perhaps re-regulation in a proper form would allow the industry to take advantage of the latest equipment, bring the new high tech safety features on line and allow the use of new ideas and designs in all aspects of aviation.

Very Truly Yours,

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